

UNITED STATES DISTRICT COURT FOR THE
WESTERN DISTRICT OF TEXAS
WACO DIVISION

JOHN FAIRCHILD and SUSIE §
FAIRCHILD, individually, and as §
Independent Administrators of, and on §
behalf of, the ESTATE OF KELLI §
LEANNE PAGE and the heirs-at-law of §
KELLI LEANNE PAGE, §
Plaintiffs, § CASE NO. 6:19-CV-00029-ADA-JCM
v. § JURY DEMANDED
CORYELL COUNTY, TEXAS; §
STEVEN RUSSELL LOVELADY; and §
WESLEY HARLAND PELFREY, §
Defendants.

**FOURTH AMENDED PLAINTIFF'S RULE 26(a)(1) INITIAL DISCLOSURES
(INCLUDING EXPERT DESIGNATIONS)**

TO: Defendant Coryell County, Texas by and through its attorneys of record, Eric A. Johnston and Andrew M. Edge, McGinnis Lochridge LLP, 600 Congress Ave., Suite 2100, Austin, Texas 78701; Defendant Steven Russell Lovelady by and through his attorney of record, J. Eric Magee, Allison, Bass & Magee, L.L.P., A.O. Watson House, 402 W. 125h Street, Austin, Texas 78701; and Defendant Wesley Harland Pelfrey by and through his attorneys of record, S. Cass Weiland and Robert A. Hawkins, Squire Patton Boggs LLP, 2000 McKinney Ave., Suite 1700, Dallas, Texas 75201.

Note Regarding Tiffany Gruwell

Notwithstanding anything to the contrary in these disclosures, there is some uncertainty as to whether Plaintiff Susie Fairchild is or will be representing the interests of Tiffany Gruwell in this case due to Ms. Gruwell's complaint in intervention, and Ms. Gruwell's retention of an attorney to represent her interests (Cory W. Smith). Defendants objected to that intervention, and the court has not ruled on the intervention, as of the drafting of these amended disclosures. Susie Fairchild's counsel recognizes that Ms. Gruwell has retained an attorney to protect her interests in this case. Thus, it is not Ms. Fairchild's counsel's intent that these amended initial disclosure be made on behalf of Tiffany Gruwell, but instead of behalf of Ms. Fairchild and all persons whose interests

EXHIBIT

she is representing. Ms. Fairchild's counsel assumes that Mr. Gruwell's counsel will make whatever disclosures, and take whatever actions in this case, he deems appropriate, including designation of experts to act on Ms. Gruwell's behalf.

Note Regarding Prior Service:

Plaintiff's Rule 26(a)(1) Initial Disclosures (including Expert Designations) were served on Defendants via U.S. mail, certified, return receipt requested on May 1, 2019 and had attached three CDs Bates-labeled Fairchild v. Coryell County "CD-1," "CD-2," and "CD-3."

The First Amended Plaintiff's Rule 26(a)(1) Initial Disclosures (including Expert Designations) were served on Defendants via U.S. mail, certified, return receipt requested on August 1, 2019 and had attached a CD Bates-labeled Fairchild v. Coryell County "CD-4" containing documents Bates-labeled Fairchild v. Coryell County P-000890 through P-001628.

The Second Amended Plaintiff's Rule 26(a)(1) Initial Disclosures (including Expert Designations) were served on Defendants via U.S. mail, certified, return receipt requested on September 5, 2019 and had attached a USB Flash Drive Bates-labeled Fairchild v. Coryell "Flash Drive – 1" containing videos converted to MP4 format.

The Third Amended Plaintiff's Rule 26(a)(1) Initial Disclosures (including Expert Designations) were served on Defendants via U.S. mail, certified, return receipt requested on October 4, 2019 and had attached a CD Bates-labeled Fairchild v. Coryell County "CD-5" containing copies of documents Bates-labeled Fairchild v. Coryell County P-001629 through P-003094. The Third Amended Plaintiff's Rule 26(a)(1) Initial Disclosures (including Expert Designations) was also served on Defendants via email on October 4, 2019 and had attached copies of documents Bates-labeled Fairchild v. Coryell County P-001629 through P-001689.

Plaintiff Susie Fairchild serves these disclosures in accordance with the requirements of Federal Rule of Civil Procedure 26(a)(1). These disclosures are subject to the following limitations:

1) Plaintiff makes these disclosures upon information reasonably available to Plaintiff at the time these disclosures were made and reserves the right to amend and/or supplement them as additional information becomes available.

2) Plaintiff has not disclosed information or documents to the extent that they are legally protected or privileged, including but not necessarily limited pursuant to the attorney-client communication privilege and work-product privilege.

Federal Rule of Civil Procedure 26(a)(1) Initial Disclosure

Rule 26(a)(1)(A)(i) Individuals Likely to Have Discoverable Information

The following individuals and/or entities are likely to have discoverable information that Plaintiff may use to support Plaintiff's claims or defenses (but not those to be used solely for impeachment):

Name(s), Address and Phone Number	Subject of Information
Coryell County, Texas c/o Eric A. Johnston and Andrew M. Edge McGinnis Lochridge LLP, 600 Congress Ave. Suite 2100 Austin, Texas 78701	Defendant
<u>Per Defendants' initial disclosures</u>	
The following people were added with the Fourth Amended Plaintiff's Rule 26(a)(1) Initial Disclosures (including Expert Designations)	
Dayton, Ronald Edge Holder Manning Nix, John Porter, Karen Pruitt, Cheryl Vasquez, Eric Williams, Scott Wilcox, Mark Washington, Tyrell	Deputy Deputy Deputy Sergeant Investigator Lieutenant Officer Deputy Sheriff Chief Officer

Name(s), Address and Phone Number	Subject of Information
Coryell Memorial Hospital a/k/a Coryell Memorial Healthcare System 1507 W. Main St. Gatesville, Texas 76528 (254) 865-8251	Provided medical treatment to Kelli Page
Gibby, Mark, MD Wright, James D., MD	
DeFoe, Scott A. On-Screne Consulting Group, LLC 526 21 st Street Huntington Beach, California 92648 (714) 655-4280	Plaintiff's retained expert and rebuttal expert
(Added with the Third Amended Plaintiff's Rule 26(a)(1) Initial Disclosures (including Expert Designations))	
Fairchild, Angie Will supplement with address and telephone number if determined; it is Plaintiff's understanding that Angie Fairchild was adopted approximately 28 years ago, and the adoption records were sealed.	Kelli Page's daughter and heir
Fairchild, John	Plaintiff (deceased)
Fairchild, Maile Sue Will supplement with address and telephone number	Kellie Page's daughter and heir
Fairchild, Patrick Sterling 201 N. 19 th Street Gatesville, Texas 76528 (254) 415-1441	Kelli Page's son and heir
Fairchild, Susie 201 N. 19 th Street Gatesville, Texas 76528 (254) 415-1441	Plaintiff

Name(s), Address and Phone Number	Subject of Information
<p>Gruszecki, Amy C. DO American Forensics 2452 U.S. 80 E. Frontage Rd. Mesquite, TX 75149 (214) 221-2700</p> <p>(Added with the Fourth Amended Plaintiff's Rule 26(a)(1) Initial Disclosures (including Expert Designations))</p>	Plaintiff's retained expert
<p>Gruwell, Tiffany May c/o Cory W. Smith Daniel Stark Law, PC P.O. Box 1153 Bryan, Texas 77806 (979) 846-8686</p>	Kelli Page's daughter and heir
<p>Joyce, Arthur, PhD, ABN Neuropsychological Systems of Texas 4201 Wingren Dr. Irving, Texas 75062 (972) 650-6166</p> <p>(Added with the Fourth Amended Plaintiff's Rule 26(a)(1) Initial Disclosures (including Expert Designations))</p>	Plaintiff's retained expert and rebuttal expert
<p>Lactod, Cesar Tamala III Will supplement with address and telephone number if determined; it is Plaintiff's understanding that Cesar Tamala Lactod III was adopted approximately 28 years ago, and the adoption records were sealed.</p>	Kelli Page's son and heir
<p>Lovelady, Steven Russell Lovelady c/o J. Eric Magee, Allison Bass & Magee, L.L.P. A.O. Watson House 402 W. 125h Street Austin, Texas 78701</p>	Defendant
<p>Pelfrey, Wesley Harland c/o S. Cass Weiland Squire Patton Boggs LLP 2000 McKinney Ave. Suite 1700 Dallas, Texas 75201</p>	Defendant

Name(s), Address and Phone Number	Subject of Information
<p><u>Per Defendants' initial disclosures</u></p> <p>Rivers, Natalie Address Unknown Telephone number Unknown</p> <p>(Added with the Fourth Amended Plaintiff's Rule 26(a)(1) Initial Disclosures (including Expert Designations))</p>	<p>Per Defendants: Upon information and belief, Ms. Rivers is a member of Kelli Page's extended family, has knowledge regarding her medical and criminal history, was present with Ranger Russell when the family viewed the video of the second use of force incident and, as such, has knowledge of facts relevant to this matter.</p>
<p><u>Per Defendants' initial disclosures</u></p> <p>Shepherd, Blake Address is unknown Telephone number unknown</p> <p>(Added with the Fourth Amended Plaintiff's Rule 26(a)(1) Initial Disclosures (including Expert Designations))</p>	<p>Per Defendants: Mr. Shepherd was an inmate at the Coryell County Jail during the first use of force incident, was a witness to Kelli Page's actions leading up to the first use of force incident and, as such, has knowledge of facts relevant to this matter.</p>
<p><u>Per Defendants' initial disclosures</u></p> <p>Tucker, Ginger Address is unknown Telephone number unknown</p> <p>(Added with the Fourth Amended Plaintiff's Rule 26(a)(1) Initial Disclosures (including Expert Designations))</p>	<p>Per Defendants: Upon information and belief, Ms. Tucker is a member of Kelli Page's extended family, has knowledge regarding her medical and criminal history, was present with Ranger Russell when the family viewed the video of the second use of force incident and, as such, has knowledge of facts relevant to this matter.</p>
<p><u>Per Defendants' initial disclosures</u></p> <p>Jennings, William Ray, Jr. c/o S. Cass Weiland Squire Patton Boggs LLP 2000 McKinney Ave. Suite 1700 Dallas, Texas 75201</p> <p>(Added with the Fourth Amended Plaintiff's Rule 26(a)(1) Initial Disclosures (including Expert Designations))</p>	<p>Per Defendants: Defendant Wesley Harland Pelfrey's designated expert witness</p>

Name(s), Address and Phone Number	Subject of Information
<p><u>Per Defendants' initial disclosures</u></p> <p>Latham, Coy, Judge c/o Eric Johnston Andrew Edge MCGINNIS LOCHRIGE, LLP 600 Congress Avenue, Suite 2100 Austin, Texas 78701 512.495.6000</p> <p>(Added with the Fourth Amended Plaintiff's Rule 26(a)(1) Initial Disclosures (including Expert Designations)</p>	<p>Per Defendants: Judge Latham was, during all or part of the relevant time period, the duly elected Justice of the Peace for the Fourth Precinct in Coryell County, responded to the second use of force incident with Kelli Page, was involved in the formal inquest and, as such, has knowledge of facts relevant to this matter.</p>
<p><u>Per Defendants' initial disclosures</u></p> <p>Miller, Roger A. Coryell County Judge c/o Eric Johnston Andrew Edge MCGINNIS LOCHRIGE, LLP 600 Congress Avenue, Suite 2100 Austin, Texas 78701 512.495.6000</p> <p>(Added with the Fourth Amended Plaintiff's Rule 26(a)(1) Initial Disclosures (including Expert Designations)</p>	<p>Per Defendants: Judge Miller was, during all or part of the relevant time period, the duly elected County Judge of Coryell County and, as such, has knowledge of facts relevant to this matter.</p>
<p><u>Per Defendants' initial disclosures</u></p> <p>Mistic, Dori Ray Attorney at Law 907 South Main St. Copperas Cove, Texas 76522 (254) 547-6000</p> <p>(Added with the Fourth Amended Plaintiff's Rule 26(a)(1) Initial Disclosures (including Expert Designations)</p>	<p>Per Defendants: Ms. Mistic was appointed to serve as attorney ad litem in Kelli Page's probate proceeding and, as such, has knowledge of facts relevant to this matter, including but not limited to Kelli Page's relationship with her children</p>

Name(s), Address and Phone Number	Subject of Information
<p><u>Per Defendants' initial disclosures</u></p> <p>Place, Allen D., Jr. Attorney at Law 109 South Seventh St. Gatesville, Texas 76528 (254) 865-8475</p> <p>(Added with the Fourth Amended Plaintiff's Rule 26(a)(1) Initial Disclosures (including Expert Designations))</p>	<p>Per Defendants: Mr. Place is the attorney representing Susie Fairchild in the probate of Kelli Page's Estate and, as such, has knowledge of facts relevant to this matter.</p>
<p><u>Per Defendants' initial disclosures</u></p> <p>Dents, Desmond Address Unknown Telephone number unknown</p> <p>(Added with the Fourth Amended Plaintiff's Rule 26(a)(1) Initial Disclosures (including Expert Designations))</p>	<p>Per Defendants: Mr. Dents was an inmate at the Coryell County Jail during the second use of force incident, was a witness to Kelli Page's actions leading up to the second use of force incident, provided a written statement to Ranger Russell as part of his investigation and, as such, has knowledge of facts relevant to this matter.</p>
<p><u>Per Defendants' initial disclosures</u></p> <p>Estes, Leslee Address Unknown Telephone number unknown</p> <p>(Added with the Fourth Amended Plaintiff's Rule 26(a)(1) Initial Disclosures (including Expert Designations))</p>	<p>Per Defendants: Upon information and belief, Ms. Estes is a member of Kelli Page's extended family, has knowledge regarding her medical and criminal history, was present with Ranger Russell when the family viewed the video of the second use of force incident and, as such, has knowledge of facts relevant to this matter.</p>

Name(s), Address and Phone Number	Subject of Information
<p><u>Per Defendants' initial disclosures</u></p> <p>Crossman, Stuart, Deputy c/o Eric A. Johnston and Andrew M. Edge McGinnis Lochridge LLP, 600 Congress Ave. Suite 2100 Austin, Texas 78701 (512) 495-6000</p> <p>(Added with the Fourth Amended Plaintiff's Rule 26(a)(1) Initial Disclosures (including Expert Designations))</p>	Per Defendants: Defendant Coryell county, Texas' current and/or former employee
<p><u>Per Defendants' initial disclosures</u></p> <p>Crouch, James Address unknown telephone number Unknown</p> <p>(Added with the Fourth Amended Plaintiff's Rule 26(a)(1) Initial Disclosures (including Expert Designations))</p>	Per Defendants: Upon information and belief, Mr. Crouch and Kelli Page were common-law married and, as such, Mr. Crouch has knowledge of facts relevant to this matter, including but not limited to her medical and criminal history as well as her relationship with her children
<p><u>Per Defendants' initial disclosures</u></p> <p>Texas Department of Public Safety 418 East Leon St. Gatesville, Texas (254) 865-7201</p> <p>Ford, Jackie – Trooper Russell, Adam, Ranter</p> <p>(Added with the Fourth Amended Plaintiff's Rule 26(a)(1) Initial Disclosures (including Expert Designations))</p>	Per Defendants: Trooper Ford was, during all or part of the relevant time period, employed as a state trooper with the Texas Department of Public Safety, responded to the second use of force incident with Kelli Page and, as such, has knowledge of facts relevant to this matter.

Name(s), Address and Phone Number	Subject of Information
<p><u>Per Defendants' initial disclosures</u></p> <p>Texas Department of Public Safety 5100 West Elms R.d Killeen, Texas (254) 616-1815</p> <p>Russell, Adam, Ranger</p> <p>(Added with the Fourth Amended Plaintiff's Rule 26(a)(1) Initial Disclosures (including Expert Designations))</p>	<p>Per Defendants: Ranger Russell was, during all or part of the relevant time period, employed as a Texas Ranger with the Texas Department of Public Safety, investigated Kelli Page's death and, as such, has knowledge of facts relevant to this matter.</p>
<p><u>Per Defendants' initial disclosures</u></p> <p>Crouch, Nicole 1703 St. Louis Street Gatesville, Texas 76542 Telephone Number Unknown</p> <p>(Added with the Fourth Amended Plaintiff's Rule 26(a)(1) Initial Disclosures (including Expert Designations))</p>	<p>Per Defendants: Upon information and belief, Ms. Crouch is Charles Crouch's niece and, as such, has knowledge of facts relevant to this matter, including but not limited to her medical and criminal history as well as her relationship with her children</p>
<p>Southern Health Partners 2030 Hamilton Place Blvd. #140 Chattanooga, TN 37421 (888) 231-2888</p>	<p>Provided healthcare treatment to Kelli Page</p>
<p><u>Per Defendants' initial disclosures</u></p> <p>The following people were added with the Fourth Amended Plaintiff's Rule 26(a)(1) Initial Disclosures (including Expert Designations)</p> <p>Ferguson, Jennifer</p>	<p>Per Defendants: The following people were added with the Fourth Amended Plaintiff's Rule 26(a)(1) Initial Disclosures (including Expert Designations)</p> <p>Ms. Ferguson was, during all or part of the relevant time period, employed as a nurse by Southern Medical Partners and contracted to serve as a nurse at the Coryell County Jail, has knowledge of Kelli Page's medical history and, as such, has knowledge of facts relevant to this matter.</p>

Name(s), Address and Phone Number	Subject of Information
<p>Southwestern Institute of Forensic Sciences at Dallas Employees, representatives, agents, and servants Office of the Medical Examiner 2355 North Stemmons Freeway Dallas, Texas 75207</p>	<p>Performed autopsy on, and/or signed report for autopsy of, Kelli Page</p>
<p><u>Medical Examiners/Physicians</u></p> <p>Barnard, Jeffrey J., MD Dyer, Tracy J., MD, JD Gwin, Chester S., MD Hastings, Stephen M., MD Lenfest, Stephen, MD Ogden, Emily, MD Quinton, Reade A., MD Townsend-Parchman, Janis K., MD Urban, Jill E., MD Ventura, Elizabeth, M.D.</p>	
<p>Washington, Tyrell Coryell County Sheriff's Office 510 Leon St. Gatesville, Texas 76528 (254) 865-7201</p>	<p>Has information regarding the relevant October 7, 2017 use-of-force incident</p>
<p>Williams, Scott A. Coryell County Sheriff's Office 510 Leon St. Gatesville, Texas 76528 (254) 865-7201</p>	<p>Coryell County, Texas Sheriff</p>
<p>All persons and/or entities identified by Defendants in initial disclosures in this proceeding, as well as any supplements or amendments thereto</p>	
<p>All records custodians responding to depositions by written questions in this proceeding and/or signing affidavits for business and/or other records</p>	
<p>Defendants' employees, agents, representatives, and all other responsible parties whose conduct is described in Plaintiff's live pleading in this proceeding</p>	

Rule 26(a)(1)(A)(ii) Relevant Documents, Data Compilations, and Tangible Things

A copy of – or a description by category and location – of all documents, electronically-stored information, and tangible things that the disclosing party has in its possession, custody, or control and may use to support its claims or defenses, unless the use would be solely for impeachment.

Plaintiff produced the following items with the Plaintiff's Rule 26(a)(1) Initial Disclosures (including Expert Designations).

Description	Number of pages/CD	Bates Numbers / CD (Fairchild v. Coryell County)
Autopsy report	9	CD-1 P-000001 through P-000009
Birth certificate	2	CD-1 P-000010 through P-000011
Booking report – Kelli Page	3	CD-1 P-000012 through P-000014
Commissioner's Court minutes: September 2015 – February 2018	137	CD-1 P-000015 through P-000151
Coryell County documents	182	CD-1 P-000152 through P-000333
Coryell County Jail Policies & Procedures Manual	194	CD-1 P-000334 through P-000527
Coryell Medical Hospital a/k/a Coryell Memorial Healthcare System – medical records	12	CD-1 P-000528 through P-000539
Coryell Medical Hospital a/k/a Coryell Memorial Healthcare System – radiology	1 and CD	CD-1 (P-000440) and CD-3
Custodial Death Report	7	CD-1 P-000541 through P-000547
Death certificate	1	CD-1 P-000548
Inquest hearing reporter's record (without attachments)	79	CD-1 P-000549 through P-000627
Letters	5	CD-1 P-000628 through P-000632
Milam County Sheriff – records regarding Kelli Page	25	CD-1 P-000633 through P-000657
Photograph – Kelli Page	1	CD-1 P-000658
TCJS – April 11, 2018 Jail Inspection report	4	CD-1 P-000659 through P-000662

Description	Number of pages/CD	Bates Numbers / CD (Fairchild v. Coryell County)
TCJS – emails and documents	27	CD-1 P-000663 through P-000689
TCJS – emails and documents	27	CD-1 P-000690 through P-000716
TCJS – inspection reports January 2014 – March 2017	15	CD-1 P-000717 through P-000731
TCJS – Nicole and James Crouch letter	2	CD-1 P-000732 through P-000733
TCOLE – documents regarding Lovelady & Pelfrey	13	CD-1 P-000734 through P-000746
TX DPS documents	143	CD-1 P-000747 through P-000889
Videos – filenames: 1. 004_M_171008065914 2. 004_M_171008065941 3. 004_M_171008070039 4. 004_M_171008070108 5. 004_M_171008070138 6. 004_M_171008070226 7. 004_M_171008070306 8. 004_M_171008070340 9. 004_M_171008070411 10. 004_M_171008070514 11. 004_M_171008070640 12. 004_M_171008070726 13. 004_M_171008070758 14. 004_M_171008070842 15. 004_M_171008070935 16. 004_M_171008070952 17. 004_M_171008071039 18. 004_M_171008071221 19. 004_M_171008071253 20. 004_M_171008071327 21. 004_M_171008071540 22. 004_M_171008071958 23. 004_M_171008072029 24. 004_M_171008072229 25. 004_M_171008072352 26. 004_M_171008072508 27. 004_M_171008072532 28. 004_M_171008072619 29. 004_M_171008072722 30. 004_M_171008072927 31. 004_M_171008073143	120	CD-2

Description	Number of pages/CD	Bates Numbers / CD (Fairchild v. Coryell County)
32. 004_M_171008073314		
33. 004_M_171008073408		
34. 004_M_171008073531		
35. 004_M_171008073700		
36. 004_M_171008073733		
37. 004_M_171008073733 (2)		
38. 004_M_171008073810		
39. 004_M_171008073810 (2)		
40. 004_M_171008074138		
41. 004_M_171008074138 (2)		
42. 004_M_171008074244		
43. 004_M_171008074244 (2)		
44. 004_M_171008074346		
45. 004_M_171008074346 (2)		
46. 004_M_171008074428		
47. 004_M_171008074428 (2)		
48. 004_M_171008074508		
49. 004_M_171008074508 (2)		
50. 004_M_171008074540		
51. 004_M_171008074540 (2)		
52. 004_M_171008074827		
53. 004_M_171008074827 (2)		
54. 004_M_171008075024		
55. 004_M_171008075024 (2)		
56. 004_M_171008075133		
57. 004_M_171008075133 (2)		
58. 004_M_171008075242		
59. 004_M_171008075242 (2)		
60. 004_M_171008075634		
61. 004_M_171008075634 (2)		
62. 004_M_171008075702		
63. 004_M_171008075702 (2)		
64. 004_M_171008075725		
65. 004_M_171008075725 (2)		
66. 004_M_171008075812		
67. 004_M_171008075812 (2)		
68. 004_M_171008075841		
69. 004_M_171008075841 (2)		
70. 004_M_171008075941		
71. 004_M_171008075941 (2)		
72. 004_M_171008080053		
73. 004_M_171008080053 (2)		
74. 004_M_171008080255		
75. 004_M_171008080255 (2)		

Description	Number of pages/CD	Bates Numbers / CD (Fairchild v. Coryell County)
76. 004_M_171008080322		
77. 004_M_171008080322 (2)		
78. 004_M_171008080357		
79. 004_M_171008080357 (2)		
80. 004_M_171008080508		
81. 004_M_171008080508 (2)		
82. 004_M_171008080724		
83. 004_M_171008080724 (2)		
84. 004_M_171008080747		
85. 004_M_171008080747 (2)		
86. 004_M_171008080838		
87. 004_M_171008080838 (2)		
88. 004_M_171008081000		
89. 004_M_171008081000 (2)		
90. 004_M_171008081024		
91. 004_M_171008081024 (2)		
92. 004_M_171008081102		
93. 004_M_171008081102 (2)		
94. 004_M_171008081249		
95. 004_M_171008081249 (2)		
96. 004_M_171008081448		
97. 004_M_171008081448 (2)		
98. 004_M_171008081553		
99. 004_M_171008081616		
100. 004_M_171008081712		
101. 004_M_171008081854		
102. 004_M_171008082134		
103. 004_M_171008082322		
104. 004_M_171008082618		
105. 004_M_171008082718		
106. 004_M_171008082750		
107. 004_M_171008082940		
108. 004_M_171008083352		
109. 004_M_171008083439		
110. 004_M_171008083855		
111. 004_M_171008084129		
112. 004_M_171008094121		
113. 004_M_171008094221		
114. 004_M_171008094311		
115. 004_M_171008094356		
116. Hallway - 008_R_171007113300		
117. Use of force - 004_M_171007113745		
118. Use of force - 008_R_171007113300		

Plaintiff produced the following with the First Amended Plaintiffs' Rule 26(a)(1) Initial Disclosures (including Expert Designations):

Description	Number of pages/CD	Bates Numbers / CD (Fairchild v. Coryell County)
Bill Blackwood LEMI of Texas response (with produced items) to subpoena for production of items	24	CD-4 P-000890 through P-000913
Coryell County District Attorney's Office's response (with produced items) to subpoena for production of items	219	CD-4 P-000914 through P-001132
Southern Health Partners' response (with produced items) to subpoena for production of items	81	CD-4 P-001133 through P-001213
T. Don Hutto Correction Center, San Antonio Field Office response (with produced items) to subpoena for production of items	2	CD-4 P-001214 through P-001215
Texas Association of Counties response (with produced items) to subpoena for production of items	257	CD-4 P-001216 through P-001472
Texas Commission on Law Enforcement response (with produced items) to subpoena for production of items	21	CD-4 P-001473 through P-001493
Texas Department of Criminal Justice response (with produced items) to subpoena for production of items	135	CD-4 P-001494 through P-001628

Plaintiff produced the following with the Second Amended Plaintiffs' Rule 26(a)(1) Initial Disclosures (including Expert Designations):

Description	Number of pages/CD	Bates Numbers / CD (Fairchild v. Coryell County)
Videos from Defendants (Coryell 498-502) (previously produced videos by Defendant Coryell County in .DAV file format) Converted to MP4 <ul style="list-style-type: none"> • CoryellCty000498 • CoryellCty000499 • CoryellCty000500 • CoryellCty000501 • CoryellCty000502 	134 total videos	Flash Drive - 1

Description	Number of pages/CD	Bates Numbers / CD (Fairchild v. Coryell County)
Videos from Coryell DA subpoena response (produced by Coryell County District Attorney's Office in response to subpoena for production of items in .DAV file format) Converted to MP4 format <ul style="list-style-type: none"> • Use of Force 5.1 • 736-815 5.4 • Hallway Use of Force 5.2 • S4 Entire Video 5.3 	118 total videos	Flash Drive - 1

Plaintiff produced the following with the Third Amended Plaintiffs' Rule 26(a)(1) Initial Disclosures (including Expert Designations) served via U.S. mail, certified, return receipt requested on October 4, 2019. Plaintiff also produced documents Bates-labeled "Fairchild v. Coryell County P-001629 through P-001689" with the Third Amended Plaintiffs' Rule 26(a)(1) Initial Disclosures (including Expert Designations) served via email.

Description	Number of pages/CD	Bates Numbers / CD (Fairchild v. Coryell County)
Deposition transcript for Scott A. Williams as Representative of Coryell County, Texas	387	CD-5 (P-001690 through P-002076)
Deposition transcript for Steven Russell Lovelady	568	CD-5 (P-002077 through P-002644)
Deposition transcript for Wesley Harland Pelfrey	421	CD-5 (P-002645 through P-003065)
Report of retained expert Scott A. DeFoe	61	CD-5 (P-001629 through P-001689)
TCOLE – status report on Adam R. Russell	12	CD-5 (P-003066 through P-003077)
TCOLE – status report on Steven R. Lovelady	5	CD-5 (P-003078 through P-003082)
TCOLE – status report on Wesley H. Pelfrey	2	CD-5 (P-003083 through P-003084)
TCOLE – status report on William R. Jennings Jr.	10	CD-5 (P-003085 through P-003094)

Plaintiff produced the following with the Fourth Amended Plaintiffs' Rule 26(a)(1) Initial Disclosures (including Expert Designations) served via first class mail and email.

Description	Number of pages/CD	Bates Numbers / CD (Fairchild v. Coryell County)
Amended report of retained expert Scott A. DeFoe	68	(P-003134 through P-003201)
Comal County Sheriff's Office – documents on Jose Guadalupe Rodriguez's death	53	(P-003220 through P-003272)
Report of retained expert Amy C. Gruszecki, DO	18	(P-003202 through P-003219)
Report of retained expert Arthur Joyce, PhD (Regarding Susie Fairchild)	19	(P-003115 through P-003133)
Report of retained expert Arthur Joyce, PhD (Regarding Patrick Fairchild)	20	(P-003095 through P-003114)

Rule 26(a)(1)(A)(iii) Computation of Damages

The disclosing party provides the following computation for each category of economic damages claimed by the disclosing party, making available for inspection and copying as under Rule 34 the documents or other evidentiary material, not privileged or protected from disclosure, on which each computation is based, including materials bearing on the nature and extent of injuries suffered.

Plaintiff will supplement this response.

Rule 26(a)(1)(A)(iv) Insurance Agreement(s)

Plaintiff does not have in Plaintiff's possession, custody, or control any insurance agreement under which any person carrying on an insurance business may be liable to satisfy part or all of a judgment which may be entered in the action or to indemnify or reimburse for payments made to satisfy the judgment, and which was not produced to Plaintiff by opposing parties, their attorneys, and/or their agents and/or representatives in connection with this action and/or events leading to this action.

2) Federal Rule of Civil Procedure 26(a)(2) Disclosure of Expert Testimony

In addition to making additional disclosures above pursuant to Rule 26(a)(1), Plaintiff provides in this section of this document expert testimony disclosure required by the Federal Rules of Civil Procedure. Plaintiff also incorporates by reference portions of this document above which also disclose such expert testimony.

Rule 26(a)(2)(A) In General

Plaintiff hereby discloses the identity of the following witnesses Plaintiff may use at trial to present evidence under Federal Rule of Evidence 702, 703, or 705. Plaintiff does not necessarily stipulate or agree that the persons listed, other than experts retained by Plaintiff, are necessarily qualified to testify as experts. Instead, based upon the nature of Plaintiff's claims and Defendants' anticipated defenses, Plaintiff expects that any of the following persons who are not retained experts might present evidence under Federal Rule of Evidence 702, 703, or 705, and might be qualified to do so:

Rule 26(a)(2)(B) Witnesses Who Must Provide a Written Report

Plaintiff discloses in this section witness(es) Plaintiff retained or specially employed to provide expert testimony in this case or those whose duties as Plaintiff's employees (if any) regularly involve giving expert testimony. The documents produced by Plaintiff for each such expert, and listed in the table below, constitute the experts' reports and which each contain:

- (i) a complete statement of all opinions the witness will express and the basis and reasons for them;
- (ii) the facts or data considered by the witness in forming them;
- (iii) any exhibits that will be used to summarize or support them;

- (iv) the witness's qualifications, including a list of all publications authored in the previous 10 years;
- (v) a list of all other cases in which, during the previous 4 years, the witness testified as an expert at trial or by deposition; and
- (vi) a statement of the compensation to be paid for the study and testimony in the case.

The following table was added with the Third Amended Plaintiff's Rule 26(a)(1) Initial Disclosures (including Expert Designations), and documents Bates-labeled Fairchild v. Coryell County P-001629 through P-001689 were produced via U.S. mail, certified, return receipt requested, and via email.

Name	Address and Phone Number	Bates Numbers / CD (Fairchild v. Coryell County)
DeFoe, Scott (police practices expert)	On-Scene Consulting Group, LLC, 526 21 st Street, Huntington Beach, California 92648 (714) 655-4280	CD-5 (P-001629 through P-001689)

The following items were also produced with the Third Amended Plaintiffs' Rule 26(a)(1) Initial Disclosures (including Expert Designations), served via U.S. mail, certified, return receipt requested:

Description	Number of pages/CD	Bates Numbers / CD (Fairchild v. Coryell County)
Deposition transcript for Scott A. Williams as Representative of Coryell County, Texas	387	CD-5 (P-001690 through P-002076)
Deposition transcript for Steven Russell Lovelady	568	CD-5 (P-002077 through P-002644)
Deposition transcript for Wesley Harland Pelfrey	421	CD-5 (P-002645 through P-003065)
Report of retained expert Scott A. DeFoe	61	CD-5 (P-001629 through P-001689)
TCOLE – status report on Adam R. Russell	12	CD-5 (P-003066 through P-003077)
TCOLE – status report on Steven R. Lovelady	5	CD-5 (P-003078 through P-003082)
TCOLE – status report on Wesley H. Pelfrey	2	CD-5 (P-003083 through P-003084)
TCOLE – status report on William R. Jennings Jr.	10	CD-5 (P-003085 through P-003094)

The following table was added with the Fourth Amended Plaintiff's Rule 26(a)(1) Initial Disclosures (including Expert Designations), and documents Bates-labeled Fairchild v. Coryell County P-003095 through P-003219 were produced:

Name	Address and Phone Number	Bates Numbers / CD (Fairchild v. Coryell County)
Gruszecki, Amy C. DO	American Forensics 2452 U.S. 80 E. Frontage Rd. Mesquite, TX 75149 (214) 221-2700	(P-003202 through P-003219)
Joyce, Arthur, PhD, ABN	Neuropsychological Systems of Texas 4201 Wingren Dr. Irving, Texas 75062 (972) 650-6166	(P-003095 through P-003114) and (P-003115 through P-003133)
DeFoe, Scott (police practices expert)	On-Scene Consulting Group, LLC, 526 21 st Street, Huntington Beach, California 92648 (714) 655-4280	(P-003134 through P-003201)

Rule 26(a)(2)(C) Witnesses Who Do Not Provide a Written Report

Plaintiff discloses in this section witnesses for whom Plaintiff is not required to provide a report, providing for each witness:

- (i) the subject matter on which the witness is expected to present evidence under Federal Rule of Evidence 702, 703, or 705; and
- (ii) a summary of the facts and opinions to which the witness is expected to testify:

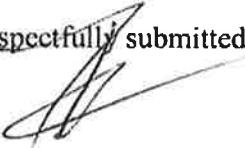
Plaintiff does not necessarily stipulate or agree that the people listed below are necessarily qualified to testify as experts. Instead, based upon the nature of Plaintiff's claims and Defendants' anticipated defenses, Plaintiff expects that any of the following persons who are not retained experts might present evidence under Federal Rule of Evidence 702, 703, or 705, and might be qualified to do so:

Name	See below
Address and Telephone Number	<p>Southwestern Institute of Forensic Sciences at Dallas, Office of the Medical Examiner, 2355 North Stemmons Freeway, Dallas, Texas 75207</p> <p>Barnard, Jeffrey J., MD Dyer, Tracy J., MD, JD Gwin, Chester S., MD Hastings, Stephen M., MD Lenfest, Stephen, MD Ogden, Emily, MD Quinton, Reade A., MD Townsend-Parchman, Janis K., MD Urban, Jill E., MD Ventura, Elizabeth, M.D.</p>
Subject Matter	Autopsy
Summary of Facts	Non-retained. Conducted the autopsy of Kelli Page and/or reviewed sufficient evidence related to and/or regarding the autopsy to provide opinions regarding injuries suffered by Ms. Page, her cause of death, and other matters mentioned in the autopsy report and supporting documents.
Name	Coryell Memorial Hospital a/k/a Coryell Memorial Healthcare System
Address and Telephone Number	<p>Coryell Memorial Hospital a/k/a Coryell Memorial Healthcare System, 1507 W. Main St., Gatesville, Texas 76528 (254) 865-8251</p> <p>Gibby, Mark, MD Wright, James D., MD</p>
Subject Matter	Medical provider(s)
Summary of Facts	Non-retained. May have examined and/or treated Kelli Page for injuries sustained as a result of the incident giving rise to this lawsuit and/or the use-of-force incident occurring the day before Kelli Page's death, and may testify regarding such medical treatment from the medical provider's recollection and/or based upon what is disclosed in related medical records.

Name	Lovelady, Steven Russell
Address and Telephone Number	c/o J. Eric Magee, Allison, Bass & Magee, L.L.P., A.O. Watson House, 402 W. 125h Street, Austin, Texas 78701
Subject Matter	Coryell County Jail, as well as general jail and incarceration, practices, policies, and customs
Summary of Facts	Plaintiff incorporates by reference the transcript for this person's deposition in this case to provide notice of his opinions and possible testimony. Plaintiff expects this person to testify regarding his knowledge related to Kelli Page, as well as applying this person's knowledge of jail practices; Coryell County policies, procedures, and customs; and clearly-established law applicable to the incident giving rise to claims in this case.
Name	Pelfrey, Wesley Harland
Address and Telephone Number	c/o S. Cass Weiland, Squire Patton Boggs LLP, 2000 McKinney Ave., Suite 1700, Dallas, Texas 75201
Subject Matter	Coryell County Jail, as well as general jail and incarceration, practices, policies, and customs
Summary of Facts	Plaintiff incorporates by reference the transcript for this person's deposition in this case to provide notice of his opinions and possible testimony. Plaintiff expects this person to testify regarding his knowledge related to Kelli Page, as well as applying this person's knowledge of jail practices; Coryell County policies, procedures, and customs; and clearly-established law applicable to the incident giving rise to claims in this case.
Name	Pruitt, Cheryl
Address and Telephone Number	Coryell County Sheriff's Office, 510 Leon Street, Gatesville, Texas 76528
Subject Matter	Coryell County Jail, as well as general jail and incarceration, practices, policies, and customs
Summary of Facts	This person's oral deposition has not yet been taken, so Plaintiff is unaware of the facts to which this person will testify. However, if that deposition is taken, Plaintiff incorporates by reference the transcript of any such deposition. Plaintiff expects this person to testify regarding his knowledge related to Kelli Page, as well as applying this person's knowledge of jail practices; Coryell County policies, procedures, and customs; and clearly-established law applicable to the incident giving rise to claims in this case.

Name	Washington, Tyrell
Address and Telephone Number	Coryell County Sheriff's Office, 510 Leon Street, Gatesville, Texas 76528
Subject Matter	Coryell County Jail, as well as general jail and incarceration, practices, policies, and customs
Summary of Facts	This person's oral deposition has not yet been taken, so Plaintiff is unaware of the facts to which this person will testify. However, if that deposition is taken, Plaintiff incorporates by reference the transcript of any such deposition. Plaintiff expects this person to testify regarding his knowledge related to Kelli Page, as well as applying this person's knowledge of jail practices; Coryell County policies, procedures, and customs; and clearly-established law applicable to the incident giving rise to claims in this case.

Respectfully submitted,


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CERTIFICATE OF SERVICE

I certify that my office served a copy of this document on the following parties' respective attorneys in charge via email and first class mail and email on December 23, 2019.

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Attorney for Intervenor Tiffany Gruwell



T. Dean Malone